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Proposed Local Counsel for Chapter 11 Debtor and Debtor-in-Possession

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF UTAH**

In re:

Western Utah Copper Company,

Debtor and Debtor-in-Possession.

Case No. 10-29159-WTT

Chief Judge William T. Thurman

Chapter 11

Filed Electronically

**STATUS REPORT RE: DISCOVERY IN CONNECTION WITH DEBTOR'S
MOTION FOR ENTRY OF AN ORDER AUTHORIZING DEBTOR TO OBTAIN
INTERIM POST-PETITION FINANCING PURSUANT TO 11 U.S.C. § 364 AND
RULE 4001 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Western Utah Copper Company, debtor and debtor in possession in the above-referenced Chapter 11 bankruptcy case (the “Debtor”), hereby files its Status Report in connection with the discovery propounded by the Senior Lienholders in connection with the Debtor’s motion (the “Financing Motion”), for entry of an order authorizing Debtors to borrow up to \$18,000,000 (up to \$650,000 following entry of an interim order and the balance following entry of a final order) on a senior secured lien, junior secured lien, and superpriority administrative claim basis from Altus Metals, LLC (“Altus”).

At the August 30, 2010 hearing, this Court ordered that the Senior Lienholders have the right to propound discovery to the Debtor narrowly tailored to the issues relating to the Financing Motion with responses to be due on September 6, 2010.

On August 30, 2010, the Senior Lienholders propounded requests for production of documents (the “Document Requests”) upon the Debtor. See Exhibit “A” hereto. As is clear from the Document Requests, the information sought was overly broad and substantially in excess of the scope of the Financing Motion. On August 31, 2010, the Debtor sent to the Senior Lienholders its objections and concerns with the broad scope of discovery which was in excess of that allowed by the Court. To date, the Senior Lienholders have not amended or revised the Discovery Requests and have not met and conferred with the Debtor.

Notwithstanding the foregoing, the Debtor used best efforts to provide documents responsive to the Document Requests. Due to the voluminous nature of the responsive documents, the Debtor created a website dedicated to such production of documents, and uploaded the documents to the server organized by categories of requests. See Exhibit “C” hereto. Finally, on September 6, 2010, the Senior Lienholders were provided access to the website. See Exhibit “D” hereto.

The Debtor is able to track access to the website. As of 2:10 p.m. (Mountain Time) on September 7, 2010, the Senior Lienholders have not attempted to access the documents on the website.

Dated: September 7, 2010

LEVENE, NEALE, BENDER, YOO & BRILL L.L.P.

By: /s/ Martin J. Brill
Martin J. Brill
Proposed Reorganization Counsel for
Chapter 11 Debtor and Debtor in Possession

DION-KINDEM & CROCKETT

By: /s/ Steven Skirvin
Steven Skirvin
Proposed Local Counsel for
Chapter 11 Debtor and Debtor in Possession

EXHIBIT A

David E. Leta (1937)
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Attorneys for DDB Utah, LC; The Raymond W. Schmelzer Marital Trust; Top- Notch Investments, LLC; Rodney Evan Schmelzer; Brent Thomas Bingham; Bridge Loan Capital Fund, LP; DPI College, LC; Milford Copper Investors II, LLC; Reynolds Brothers, Inc.; and Milford Investors, LLC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

In re:

WESTERN UTAH COPPER COMPANY,

Debtor.

Bankruptcy Case No. 10-29159 WTT
Chapter 11

[Filed Electronically]

**REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY THE
SENIOR SECURED CREDITORS TO WESTERN UTAH COPPER COMPANY
REGARDING THE INTERIM DIP FINANCING MOTION**

DDB Utah, LLC; The Raymond W. Schmelzer Marital Trust; Top- Notch Investments, LLC; Rodney Evan Schmelzer; Brent Thomas Bingham; Bridge Loan Capital Fund, LP; Devin Durrant DPI College, LC; Milford Copper Investors II, LLC; Reynolds Brothers, Inc.; and Milford Investors, LLC (collectively, the “**Secured Creditors**”), through counsel, submit their *Request for Production of Documents* (the “**Requests**”) to Western Utah Copper Company (the

“**Debtor**”) to be produced or made available as the case may be, to the Secured Creditors’ counsel at the above address on Monday, September 6, 2010, pursuant to an Order from the Court read into the record at the hearing on August 30, 2010.

DEFINITIONS

The following definitions shall apply to the Requests.

1. The word “**Altus**” refers to Altus Metals, LLC, and to all persons or entities acting on Altus’ behalf or at its instance, including its attorneys, agents and officers.

2. The name “**Blue Mountain**” refers to Blue Mountain Equipment Leasing LLC, and to all persons or entities acting on Blue Mountain’s behalf or at its instance, including its attorneys, agents and officers.

3. The “**Bryan Declaration**” refers to the Declaration of A. John A. Bryan Jr. in support of the DIP Motion, Docket No. 158.

4. The word “**Case**” refers to the Chapter 11 bankruptcy case of the Debtor, currently pending in the United States Bankruptcy Court for the District of Utah, Case No. 10-12159- WTT.

5. The term “**Debtor**” refers to Western Utah Copper Company, and to all persons or entities acting on the Debtor’s behalf or at its instance, including its attorneys, agents and officers.

6. The phrase “**describe in detail**” and the word “**identify**” mean to describe the substance of the matter inquired into, including (i) all facts concerning the subject matter, (ii) dates of occurrences, (iii) identification of persons with knowledge of the subject matter inquired into or that participated in or witnessed the occurrences, including the name of the person(s), their address(es), telephone number(s), and a summary of the information known or held by them, and (iv) identification of all documents regarding, concerning, referring to, describing, evidencing, supporting, substantiating, disproving, invalidating, refuting, contradicting, negating, controverting, constituting, and/or otherwise relating to your description of the matter of inquiry.

7. The term “**DIP Motion**” refers to that certain *Debtor’s Motion for Entry of an Order Authorizing Debtor to Obtain Post-Petition Financing Pursuant to 11 U.S.C. § 364 and Rule 4001 of the Federal Rules of Bankruptcy Procedure*, filed by the Debtor in the Case on August 23, 2010, as Docket No. 154.

8. The word “**document**” is used in its most expansive sense and includes, but is not limited to, writings, records, drafts, notes, notices, memoranda, diaries, journals, letters, correspondence, e-mails and other electronic messages, agreements, summaries, exhibits, demands, drawings, graphs, charts, photographs, phonorecords, data files (whether stored on a desktop computer, laptop computer, personal digital assistant (PDA), blackberry, network drive, server, mainframe, internet service provider, internet data storage site, web page, CD Rom, floppy disk, Zip Disk, backup tape, replaced or removed hard-drive, external hard-drive, Jaz disk, or otherwise), digital telephony, and other data compilations from which information can be obtained (whether existing in print or electronic format, and whether stored in digital or analog format), and is equal in scope to the usage of this term in the Federal Rules of Civil Procedure.

9. The term “**Environmental Laws**” means any federal, state or local law (including any statute, rule, regulation, ordinance, code or rule of common law), and any judicial or administrative interpretation thereof, and any decree, judgment, policy, written guidance or judicial or administrative order relating to the environment, health, safety, or Hazardous Materials, including, without limitation, the Comprehensive Environmental Response Compensation and Liability Act, 42 U.S.C. § 9901 et seq., the Resource Conservation and Recovery Act of 1976, 42 U.S.C. § 6901 et seq., the Emergency Planning and Community Right-to-Know Act, 42 U.S.C. § 11001 et seq., the Clean Air Act, 42 U.S.C. § 7401 et seq., the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq., the Toxic Substance Control Act, 15 U.S.C. § 2601 et seq., the Safe Drinking Water Act, U.S.C. § 300f et seq., the Occupational Safety and Health Act, 42 U.S.C. § 1801 et seq., the Federal Insecticide, Fungicide and Rodenticide Act, 7 U.S.C. § 136 et seq., the Hazardous Materials Transportation Act, 49 U.S.C.

§ 1801 et seq., and their state counterparts or equivalents, all as amended, and any regulations or rules adopted or publications promulgated pursuant thereto.

10. The word “**Empire**” refers to Empire Advisors, LLC, and to all persons or entities acting on Empire’s behalf or at its instance, including its attorneys, agents and officers.

11. The phrase “**Empire Agreement**” refers to that certain Purchase and Sale Investment Agreement by and between the Debtor, Copper King Mining Corporation, Blue Mountain, Altus, and Mark D. Dotson, J.R., and having an effective date of September 18, 2009.

12. The phrase the “**Hatch Report**” refers to that certain Overview Due Diligence of Western Utah Copper, attached as Exhibit A to the Declaration of Marcus Southworth in Support of the DIP Motion, filed in the Case as Doc. No. 34.

13. The “**Interim Bryan Declaration**” refers to the Declaration of A. John A. Bryan Jr. in support of the Interim DIP Motion, Docket No. 165.

14. The term “**Interim DIP Motion**” refers to that certain *Debtor’s Ex Parte Motion for Hearing on Shortened Notice on Debtor’s Motion for Entry of an Order Authorizing Debtor to Obtain Post-Petition Financing Pursuant to 11 U.S.C. § 364 and Rule 4001 of the Federal Rules of Bankruptcy Procedure*, filed by the Debtor in the Case on August 23, 2010, as Docket No. 164.

15. The term “**Interim July Order**” means that certain Amended Order Re: Motion for Entry of an Interim Order Authorizing Debtor to Obtain Post-Petition Financing Pursuant to 11 U.S.C. § 364 and Rule 4001 of the Federal Rules of Bankruptcy Procedure’ entered by the Nevada Bankruptcy Court on July 2, 2010.

16. The word “**Mine**” refers to the Debtor’s business venture located in Milford, Utah, and more particularly described as comprising of all of the real property identified in the Debtor’s Schedule A, Page 3 of 141 of the Schedules and SOFA.

17. The phrase “**Schedules and SOFA**” refers to the documents filed by the Debtor in the Case on June 1, 2010 as Nevada Docket No. 24.

18. The phrase “**Watley Group**” refers to the Debtor’s financial advisors, as identified on paragraph 11 of the DIP Motion.

19. The words “**you**,” “**your**” or “**yours**” refers to the Debtor.

INSTRUCTIONS

Each portion of the Requests is intended to call for a response, whether such portion is stated in a separate sentence, or is stated in conjunction with another portion or portions of a single sentence, or is specifically designated in a particular request, or is incorporated therein by the “definitions” section hereof. If you object to a portion of any request, you are instructed to respond to the remainder.

For each and every request for production, please provide for inspection and copying true and correct copies, of which all portions are clear, concise, and legible. Alternatively, a reasonable method of responding to this request would be for you to provide legible photocopies of the documents sought and copies of the photographs or other tangible things.

If it appears to you or your attorneys that a complete answer to any of the following requests will call for communications or documents that are (i) protected by the attorney-client privilege, (ii) subject to attorney work-product immunity, or (iii) protected under any other privilege or immunity, please furnish in response to the particular request a log numerically listing each such communication or document, and containing the date, type of communication/document, author(s), recipient(s), a topical description of such communication/document, and a statement of all reasons for your claim that the communication/document is privileged or otherwise protected from discovery.

SUPPLEMENTATION OF RESPONSES

The discovery requested in the Requests is continuing. If any information or documents are discovered by you or become known to you, or to your attorney, or to anyone else acting on your behalf, after you respond to the Requests, you are directed to furnish said information to the undersigned prior to trial and in a timely manner.

DESTROYED DOCUMENTS

If any documents requested herein or fairly comprised within the scope of the following requests have been lost or destroyed, please provide in lieu of a true and correct copy thereof a list of each document so lost or destroyed, together with the following information: (a) the date of origin; (b) a brief description of the document; (c) the author of the document; (d) the date upon which the document was lost or destroyed; (e) a brief statement of the manner in which the document was lost or destroyed; and (f) a description of any policy pursuant to which such document was destroyed.

REQUESTS FOR PRODUCTION OF DOCUMENTS

Pursuant to Federal Rule of Civil Procedure 34, made applicable by Federal Rules of Bankruptcy Procedure 34 and 9014, the Secured Creditors hereby requests that you produce for inspection and copying the following documents or things. Please refer to the definitions and general instructions when responding to these requests. If a request asks for a document that you have already provided to the Secured Creditors, please indentify the documents and include in your identification the date when you provided the document, the medium (e.g., e-mail, mail, etc), and any other information that may aid the Secured Creditors in locating the document (e.g., page no., etc).

REQUEST NO. 1. All invoices, contracts, service agreements, work orders, purchase orders, bids and other documents, including copies of cancelled checks, related to the "Item/Descriptions" and "Amounts" identified on Exhibit 1, page 10 of 56, of the Interim Bryan Declaration.

REQUEST NO. 2. All communications between the Debtor and Rocky Mountain Power Company between January 1, 2010 and August 30, 2010.

REQUEST NO. 3. All contracts, invoices and agreements between the Debtor and Tetra Tech between January 1, 2010 and August 30, 2010.

REQUEST NO. 4. All invoices, contracts, service agreements, work orders, purchase orders, and other documents, including copies of cancelled checks, related to the Debtor's use of the funds that it obtained in connection with the Interim July Order.

REQUEST NO. 5. Other than the documents produced in response to Requests Nos. 1-4 above, all documents supporting the amounts of the requests set forth on Exhibit 1, page 10 of 56 of the Interim Bryan Declaration.

REQUEST NO. 6. Copies of all cancelled checks, deposits and wire transfers in connection with the Debtor's post-petition bank accounts, including all bank statements regarding such accounts.

REQUEST NO. 7. A list of all of the names, addresses, titles, duties, salaries and/or hourly wages of all employees, officers, and directors of the Debtor between May 18, 2010 and August 30, 2010.

REQUEST NO. 8. With respect to all of the persons identified in Request No. 4 above, a list of all amounts paid and withheld from such employees after May 18, 2010, including a list of all reimbursements made to each such employee and the backup upon which such reimbursements were made.

REQUEST NO. 9. An itemization of all services rendered to or for the Debtor by A. John A. Bryan, Jr., by date, amount of time expended and description of services performed.

REQUEST NO. 10. An itemization of all out-of-pocket costs incurred for or on behalf of the Debtor by A. John A. Bryan Jr., showing what reimbursements, if any, were made by the Debtor for such costs.

REQUEST NO. 11. All documents, including emails communications and drafts of agreements, between the Debtor and Altus that were exchanged or delivered between January 1, 2009 and August 30, 2010.

REQUEST NO. 12. All documents, including emails communications and drafts of agreements, between the Debtor and Empire that were exchanged or delivered between January 1, 2009 and August 30, 2010.

REQUEST NO. 13. An itemization, by date and amount, of all funds that the Debtor has received from Altus or Empire after January 1, 2009.

REQUEST NO. 14. All of the Debtor's federal tax returns, or copies of the consolidated tax returns of the Debtor and Copper King Mining Company ("CK"), that were filed for the tax years of 2004 - 2009.

REQUEST NO. 15. All communications, including email communications, between the Debtor, or CK, and the Securities and Exchange Commission ("SEC") between January 1, 2009 and August 30, 2010.

REQUEST NO. 16. All communications, including email communications, between the Debtor, or CK, and the Utah Department of Labor between January 1, 2009 and August 30, 2010.

REQUEST NO. 17. All third-party appraisals of the Debtor's assets, or any portion thereof, that were prepared after January 1, 2007.

REQUEST NO. 18. All title reports of the Debtor's real property assets, or any portion thereof, that were prepared after January 1, 2007.

REQUEST NO. 19. All summaries, summary reports, and summary analyses of the Debtor's mining properties with regard to grade, type, quantity and/or quality of ore related thereto.

REQUEST NO. 20. All documents related to or supporting the asset valuations contained the Bryan Declaration.

REQUEST NO. 21. All documents related to or supporting the financial projections attached as Exhibits to the Bryan Declaration, including documents supporting the assumptions related thereto.

REQUEST NO. 22. All documents related to any analysis concerning Environmental Laws or mitigation plans related to Environmental Laws related to the Mine.

REQUEST NO. 23. All documents related to status of the Mine's existing permits, and timing to obtain any outstanding authorizations and costs associated with the same.

REQUEST NO. 24. All documents related to current and historical violations or fines imposed upon the Mine.

REQUEST NO. 25. All documents related to reclamation plans and estimation of costs necessary for salvaging any of the Mine's facilities and reclamation work requirements for the termination of the Mine's pending projects.

REQUEST NO. 26. All documents related to any communications (including any agreements) between the Watley Group and the Debtor.

REQUEST NO. 27. All documents related to any communications (including any agreements) between the Watley Group and Altus

REQUEST NO. 28. All documents related to any communications (including any agreements) between the Watley Group and Empire

REQUEST NO. 29. All documents related to any agreements between any member of the Debtor's board of directors and the Watley Group.

REQUEST NO. 30. All documents related to the terms of employment of John Bryan as the Debtor's CEO.

REQUEST NO. 31. All documents related to or constituting all communications and/or agreements between the Debtor, on the one hand, and any prospective lender (including any possible debtor in possession financing), venture partner, or investor in the Debtor, on the other hand. Please identify the individuals involved in the communications, including the name of their employer, and their contact information (e.g., e-mail address, telephone number, and addresses).

REQUEST NO. 32. All documents related to or constituting all communications and/or agreements between the Debtor, on the one hand, and any prospective purchaser of some or all of the Debtor's assets (including any possible plan funder), venture partner, or investor in the Debtor, on the other hand. Please identify the individuals involved in the communications, including the name of their employer, and their contact information (e.g., e-mail address, telephone number, and addresses).

REQUEST NO. 33. All documents related to the transfer of any assets by the Debtor outside the ordinary course of business that were made at any time after May 18, 2008. Please include and separately identify all documents related to each of the transfers identified in

response to question 10 of the SOFA, which appear on Page 105 of 151 of the Schedules and SOFA.

REQUEST NO. 34. All documents related to the relationship, if any, between the Debtor and Blue Mountain.

REQUEST NO. 35. All communications and/or agreements between the Debtor, on the one hand, and Blue Mountain, on the other hand that relate to any of the assets that were sold by the Debtor to Empire.

REQUEST NO. 36. All documents (a) related to the Hatch Report, including (b) any updates to the Hatch Report, and (c) any communications about the Hatch Report between and among the employees, shareholders, and other agents of the Debtor, and (d) between the Debtor and any third party.

REQUEST NO. 37. All documents related to the lien, claim, and priority of the claim against the Debtor purportedly held by the Second Lien Lenders, as defined at Page 52 of 141 of the Schedules and SOFA.

REQUEST NO. 38. All documents related to the lien, claim, and priority of the claim against the Debtor purportedly held by Republic Bank, as identified at Page 51 of 141 of the Schedules and SOFA.

REQUEST NO. 39. All documents related to the lien, claim and priority of the claim against the Debtor purportedly held by A.T. Massey Coal Company, Inc., as identified at Page 50 of 141 of the Schedules and SOFA.

REQUEST NO. 40. All documents related to the lien, claim, and priority of the claim against the Debtor purportedly held by Comstock Financial, as identified at Page 40 of 141 of the Schedules and SOFA.

REQUEST NO. 41. All documents related to the lien, claim, and priority of the claim against the Debtor purportedly held by Devin Durrant (Third Lien Lender), as identified at Page 50 of 141 of the Schedules and SOFA.

REQUEST NO. 42. All documents related to any communication between the Debtor and Michael G. Nelson.

REQUEST NO. 43. All documents related to any communication between the Debtor and David Hartshorn.

REQUEST NO. 44. All documents related to any communication between the Debtor and O. Jay Gatten.

REQUEST NO. 45. All documents related to any communication between the Debtor and Tetra Tech, or any of its employees.

Dated this 30th day of August, 2010.

Snell & Wilmer

/s/ _____
David E. Leta
Attorneys for the Secured Creditors

EXHIBIT B

LEVENE, NEALE, BENDER, YOO & BRILL LLP
LAW OFFICES

L N B Y & B

August 31, 2010

Via Electronic Mail

David E. Leta, Esq.
Snell & Wilmer LLP
15 West South Temple, Suite 1200
Salt Lake City, UT 84101
dleta@swlaw.com

**Re: In re Western Utah Copper Company
Bankruptcy Case No. 10-29159-WTT**

Dear Mr. Leta,

We are in receipt of the "Requests For Production Of Documents Propounded By The Senior Secured Creditors To Western Utah Copper Company Regarding The Interim DIP Financing Motion" (the "Requests") propounded upon Western Utah Copper Company, the Chapter 11 debtor and debtor in possession (the "Debtor"), by the Senior Secured Creditors, on August 30, 2010, at approximately 6:00 p.m., pacific standard time. The Requests seek 45 categories of documents, to be produced to the Senior Secured Creditors, within three (3) business days.

While we are more than willing to work with you in providing to the Senior Secured Creditors discovery, we submit that the Requests propounded by your clients are unreasonable, wholly overbroad, not relevant to the DIP Financing Motion filed by the Debtor, and unduly burdensome and oppressive. It is clear from the Requests that the Senior Secured Creditors have made no effort whatsoever to narrowly tailor the requests in connection with the upcoming *interim* hearing on the DIP Financing Motion. For example, the Senior Secured Creditors have requested "All documents related to any communication between the Debtor and Michael G. Nelson", "All documents related to any communication between the Debtor and David Hartshorn", "All documents related to any communication between the Debtor and O. Jay Gatten", "All documents related to any communication between the Debtor and Tetra Tech", "All communications between the Debtor and Rocky Mountain Power Company between January 1, 2010 and August 30, 2010", "All contracts, invoices and agreements between the Debtor and Tetra Tech between January 1, 2010 and August 30, 2010", "All communications, including email communications, between the Debtor, or CK, and the Securities and Exchange Commission between January 1, 2009 and August 30, 2010", "All communications, including email communications, between the Debtor, or CK, and the Utah Department of Labor between January 1, 2009 and August 30, 2010", "All documents related to any analysis concerning Environmental Laws or mitigation plans related to Environmental Laws related to the Mine", "All documents related to current and historical violations or fines imposed upon the Mine", "All documents related to any communications (including

L N B Y & B

August 31, 2010
Page 2

any agreements) between the Watley Group and the Debtor”, “All documents related to any communications (including any agreements) between the Watley Group and Altus”, “All documents related to any communications (including any agreements) between the Watley Group and Empire”, “All documents related to any agreements between any member of the Debtor’s board of directors and the Watley Group”, “All documents related to the terms of employment of John Bryan as the Debtor’s CEO”, and “All documents related to the relationship, if any, between the Debtor and Blue Mountain”. These are but examples of the overbroad and irrelevant Requests made by the Senior Secured Creditors, which have no bearing upon the subjects that will be at issue on the September 8, 2010 interim hearing on post-petition financing.

The Debtors hereby request a meet and confer conference for the purpose of narrowing the scope of the documents requested by the Senior Secured Creditors. Given the narrow window of time between now and the hearing on September 8, 2010, the Debtor submits that it would be reasonable to limit the scope of discovery to the immediate issues of concern. The Senior Secured Creditors, rather than making a focused request for those documents that are of utmost importance and relevance to the upcoming hearing, have instead propounded a vague, unduly burdensome, request, which is not capable of receiving any intelligible response during the narrow time frame for discovery. Most disconcerting is the fact that, while the Senior Secured Creditors make such broad requests, they are the same party that objected to the Debtor’s request for financing to retain the employees necessary to be able to assist the Debtor in responding to such discovery requests.

In an effort to help resolve these issues, we propose to have a meet and confer conference, by telephone, on September 1, 2010. Please advise as to your availability then. The Debtor reserves all of its rights.

Very truly yours,

/s/ Krikor J. Meshefejian

Krikor J. Meshefejian

cc: Martin J. Brill, Esq. (i/o)
David B. Golubchik (i/o)
Steve Skirvin (email)

EXHIBIT C

9/7/2010

Folder Access List: David Leta

Report generated on Tuesday, September 07, 2010

- SR. DEBT DISCOVER REQUEST [Download, View]
 - REQUEST NO. 11 and 12 [Download, View]
 - REQUEST NO. 13 [Download, View]
 - REQUEST NO. 14. [Download, View]
 - REQUEST NO. 15. [Download, View]
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 - REQUEST NO. 19. [Download, View]
 - WUCC Technical Data File [Download, View]
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 - Essex-Toledo Mapping [Download, View]
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 - REQUEST NO. 35 [Download, View]
 - REQUEST NO. 36. [Download, View]
 - Chris McBean - Hatch [Download, View]
 - REQUEST NO. 37 [Download, View]
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 - REQUEST NO. 40. [Download, View]
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- REQUEST NO. 43 [Download, View]
 - Dave H Correspondence [Download, View]
 - Assays 1 [Download, View]
 - Communication on permitting [Download, View]
 - Communication with debtor [Download, View]
 - Communication with Hatch [Download, View]
 - Mining Claims [Download, View]
 - Misc. reports, maps, etc [Download, View]
 - assays [Download, View]
 - Chemex [Download, View]
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 - jan1_pit_start [Download, View]
 - geology [Download, View]
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 - long_sections [Download, View]

9/7/2010

- macros [Download, View]
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 - optimized_pits [Download, View]
- mine_2 [Download, View]
- model [Download, View]
 - estimation [Download, View]
 - reports [Download, View]
 - versions [Download, View]
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EXHIBIT D

David B. Golubchik

From: Leta, David [dleta@swlaw.com]
Sent: Monday, September 06, 2010 5:18 PM
To: David B. Golubchik
Cc: Martin J. Brill; Krikor J. Meshefejian
Subject: RE: WUCC


I am now back in SLC. I just received the email from McMullin but have not tried to access the site yet. I will let you know if I have any problems.

David E. Leta
Snell & Wilmer
L.L.P.

15 West South Temple, Suite 1200; Beneficial Life Tower;
Salt Lake City, Utah 84101-1547
(801) 257-1928 (direct), x 1900 (main), x1800 (facsimile)
801-560-LETA (5382) (mobile)
www.swlaw.com
dleta@swlaw.com

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From: David B. Golubchik [mailto:DBG@Inbyb.com]
Sent: Monday, September 06, 2010 5:15 PM
To: Leta, David
Cc: Martin J. Brill; Krikor J. Meshefejian
Subject: WUCC

David,
I am confirming that an email was sent to you with access to the document production. If you have any problems, let me know

David B. Golubchik
Lovene, Neale, Bender, Yoo
& Brill L.L.P.
Telephone: (310) 229-1234
Facsimile: (310) 229-1244

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CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of September, 2010, a true and correct copy of the attached document was filed via this Court's ECF system, and thus served electronically on those parties having registered to receive such service.

/s/ Angela Antonio
Angela Antonio

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